

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

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In re:	PROMESA
	Title III
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	(Jointly Administered)
Debtors. <sup>1</sup>	

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**JOINT INFORMATIVE MOTION  
REGARDING APRIL 28, 2021 HEARING ON TWO-HUNDRED NINETY-EIGHTH  
OMNIBUS OBJECTION TO CLAIMS**

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To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court’s *Order Regarding Procedures for Hearing on April 28, 2021* [Case No. 17-3283, ECF No. 16475] (the “Procedures Order”), the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of the Commonwealth of Puerto Rico (the “Commonwealth”), pursuant to section 315(b) of the *Puerto*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> and Baxter Sales and Distribution Puerto Rico Corp. (“Baxter Sales,” and, collectively, the “Parties”) respectfully submit this joint informative motion:

**I. Response Filed by Baxter Sales [ECF No. 16399]**

1. The Parties will appear telephonically at the April 28, 2021 hearing on the *Two Hundred Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [Case No. 17-3283, ECF No. 16018] (the “Objection”).

2. The following individuals may appear to speak on behalf of the Parties:

- a. Commonwealth: Laura Stafford, and/or Brian S. Rosen
- b. Baxter Sales: Jose L. Ramirez-Coll

3. The Parties propose the Court allocate 10 minutes for a hearing on the Objection.

The Parties have agreed to allocate such time as follows:

- a. Commonwealth:
  - i. Commonwealth: 4 minutes
- b. Objecting Party:
  - i. Baxter Sales: 4 minutes
- c. Debtor’s Rebuttal:
  - i. Commonwealth: 2 minutes

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<sup>2</sup> PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

**II. Response Filed by Unique Builders, Inc. [ECF No. 16386]<sup>3</sup>**

4. The Commonwealth will appear telephonically at the April 28, 2021 hearing on the *Two Hundred Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [Case No. 17-3283, ECF No. 16018] (the “Objection”).

5. The following individuals may appear to speak on behalf of the Commonwealth:

a. Commonwealth: Laura Stafford, and/or Brian S. Rosen

6. The Commonwealth proposes the Court allocate 5 minutes for a hearing on the Objection. WHEREFORE, the Parties respectfully request that the Court take notice of the above.

Dated: April 23, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen  
Martin J. Bienenstock  
Brian S. Rosen  
(Admission *pro hac vice*)  
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/s/ Hermann D. Bauer  
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**O’NEILL & BORGES LLC**

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<sup>3</sup> Counsel for the Oversight Board contacted counsel for Unique Builders, Inc. (“Unique Builders”) on April 22, 2021 to determine whether Unique Builders intended to appear telephonically. To date, counsel for the Oversight Board has not received a response.

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